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Attorneys for Defendants
MPOWERHEALTH PRACTICE
MANAGEMENT, LLC; NORTH AMERICAN
NEUROLOGICAL ASSOCIATES, PC; N
EXPRESS PC; INEUROLOGY, PC and BRUIN
NEUROPHYSIOLOGY, PC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

ANTHEM BLUE CROSS LIFE AND
HEALTH INSURANCE COMPANY, a
California corporation, BLUE CROSS OF
CALIFORNIA DBA ANTHEM BLUE
CROSS, a California corporation,

Plaintiff,

v.

HALOMD, LLC; ALLA LAROQUE;
SCOTT LAROQUE; MPOWERHEALTH
PRACTICE MANAGEMENT, LLC;
BRUIN NEUROPHYSIOLOGY, P.C.;
INEUROLOGY PC; N EXPRESS, PC;
NORTH AMERICAN NEUROLOGICAL
ASSOCIATES, PC; SOUND
PHYSICIANS EMERGENCY
MEDICINE OF SOUTHERN
CALIFORNIA, P.C.; and SOUND
PHYSICIANS ANESTHESIOLOGY OF
CALIFORNIA, P.C.,

Defendants.

Case No. 8:25-cv-01467-KES

**DEFENDANTS
MPOWERHEALTH PRACTICE
MANAGEMENT, LLC; BRUIN
NEUROPHYSIOLOGY, P.C.;
INEUROLOGY, PC; N EXPRESS,
PC; AND NORTH AMERICAN
NEUROLOGICAL ASSOCIATES,
PC'S NOTICE OF MOTION TO
JOIN IN THE SPECIAL
MOTIONS TO STRIKE
PURSUANT TO CAL. CODE CIV.
PROC. § 425.16 FILED BY
DEFENDANTS (A) HALOMD,
LLC, ALLA LAROQUE, AND
SCOTT LAROQUE; AND (B)
SOUND PHYSICIANS.**

Hearing Date: March 10, 2026
Hearing Time: 10:00 am
Courtroom: 6D

Honorable Karen E. Scott
Magistrate Judge

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that Defendants MPOWERHealth Practice
 3 Management, LLC; Bruin Neurophysiology, P.C.; N Express, PC; and North
 4 American Neurological Associates, PC (collectively “Providers”)¹, by and through
 5 their undersigned counsel, hereby give notice that they move to join in the Special
 6 Motions to Strike Pursuant to Calif. Code of Civil Proc. § 425.16 filed by: (1)
 7 Defendants HaloMD, LLC, Alla LaRoque, and Scott LaRoque; and (2) Sound
 8 Physicians. This joinder is based on the fact that the allegations of the First
 9 Amended Complaint (FAC) against the Providers are so similar to those addressed
 10 by the moving parties that a separate motion would be redundant and constitute an
 11 unnecessary consumption of the Parties’ and Court’s time and resources.

12 A request to join a separately filed motion should be granted when “either (1)
 13 the parties are so similarly situated that filing an independent motion would be
 14 redundant, or (2) the party seeking joinder specifically points out: which parts of
 15 the motion apply to the joining party, the joining party’s basis for standing, and the
 16 factual similarities between the joining party and moving party that give rise to a
 17 similar claim or defense.” *Tatung Company, Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d
 18 1138, 1151 (C.D. Cal. 2016) (citing *United States v. Longoria*, CR No. 89–225–FR,
 19 1990 WL 11418, at *4 (D. Or. Jan. 31, 1990); *United States v. Ledbetter*, No. 2:14–
 20 CR–127, 2015 WL 5954587, at *2 (S.D. Ohio Oct. 14, 2015); *United States v.*
 21 *Cerna*, No. CR–08–0730 WHA, 2011 WL 500229, at *12 (N.D. Cal. Feb. 9,
 22 2011)); *United States v. Svihel*, No. 15–cr–190 (2)(4) (DSD/LIB), 2016 WL
 23 1212364, at *6 (D. Minn. Feb. 25, 2016). Both of those conditions are satisfied
 24 here.

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 28 ¹ While MPOWERHealth Practice Management, LLC is not a medical provider like
 the other defendants bringing this motion, this motion refers to these defendants as
 “the Providers” for concision.

1 First, most of the substantive factual allegations of the FAC which are
2 subject to the pending motions are equally applicable to the Providers. Specifically,
3 the Independent Resolution (“IDR”) process the Providers are alleged to have
4 resorted to is the same “official proceeding authorized by law” which underlies the
5 pending motions. (FAC ¶ 67) The Providers engaged in the same open
6 negotiations (FAC ¶ 45), IDR submissions (FAC ¶ 54), eligibility submissions
7 (FAC ¶ 73) and allegedly “inflated” offers (FAC ¶ 119). Thus, Anthem seeks to
8 impose the same liability on the Providers for engaging in protected speech as it
9 does with the moving parties. Moreover, Anthem’s factual allegations against the
10 Providers implicate the Providers’ exercise of their first amendment rights in the
11 same way and for the same reasons articulated in the pending Special Motions to
12 Strike. Thus, the Providers have the same basis for standing as HaloMD, Alla
13 LaRoque, Scott LaRoque, and the Sound Physicians. As a result, a motion from the
14 Providers would be redundant.

15 What is more, both motions advance arguments that Anthem’s allegations
16 against them are predicated on protected activity and that Anthem cannot meet its
17 burden of establishing a likelihood of prevailing on its claims. Those aspects of the
18 pending motions are specifically applicable to the Providers. Anthem similarly
19 alleges that the Providers engaged in protected activity by pursuing their claims
20 against Anthem in Congressionally established IDR proceedings. (FAC ¶¶ 86-125).
21 Moreover, like the moving Defendants, the Providers have established that Anthem
22 cannot meet its burden under Cal. Code Civ. Proc. § 425.16 of establishing it can
23 prevail on its claims. The Providers detail their arguments on that point in their
24 separately filed motion to dismiss under Rule 12(b)(6).

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1 Given these similarities and the fact that the legal assertions made in the
2 pending motions are equally applicable to the Providers, the Providers respectfully
3 request permission to join in those pending motions. Specifically, to the extent the
4 Court grants those Special Motions to Strike with respect to the moving parties,
5 they should be granted with respect to the Providers.

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7 Dated: December 12, 2025

Respectfully submitted,

8 JONES DAY

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10 By: 

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